

BEFORE THE UNITED STATES
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

DEPT OF TRANSPORTATION
DOCKETS

MAR 20 2009 A 9:53

In the Matter of
FRONTIER AIRLINES, INC.

Docket No. FAA-2009-0177
FAA Case No. 2008NM210015
FAA Docket No. CP09NM0005

Judge Richard C. Goodwin

**RESPONDENT'S OBJECTIONS AND RESPONSES
TO COMPLAINANT'S INITIAL DISCOVERY REQUEST**

Pursuant to 14 C.F.R. § 13.220, Respondent Frontier Airlines, Inc. ("Frontier"), by and through its counsel, Pillsbury Winthrop Shaw Pittman LLP, hereby responds as follows to the Complainant Federal Aviation Administration's ("Complainant" or "FAA") Initial Discovery Request dated March 20, 2009 (the "Request").

GENERAL OBJECTIONS

1. Frontier objects to the Request to the extent that it calls for the production of any document or portion thereof that is protected from disclosure by reason of the attorney-client privilege, the work product doctrine, the joint defense or common interest doctrine or privilege, the self-evaluation privilege, or any other applicable privilege, doctrine, law, or rule. Inadvertent production of any materials subject to any privilege, doctrine, or rule, or otherwise protected or immune from discovery shall not constitute a waiver of any privilege or of any ground for objecting to discovery of such material, its subject matter, or information contained therein, or Frontier's right to object to the use of such material during any later proceeding. To the extent that Frontier withholds from its response to the Request information or documents solely on the basis that such information or documents are protected from disclosure by any privilege, doctrine, law, or rule set forth above, Frontier will identify the applicable privilege, doctrine,

law, or rule and describe generally the information or documents it is withholding based on the privilege, doctrine, law, or rule.

2. Frontier objects to the Request to extent that it seeks to impose obligations on Respondent not required by the Rules of Practice, such as preparing lists of all documents, as opposed to simply making such documents available. As such, the requests are overly broad and burdensome

3. Frontier objects to the Request to the extent that it requests confidential, proprietary, or highly sensitive business information or to the extent that it permits information produced in response to the Request to be used in any action or proceeding other than the above-referenced action, including under the Freedom of Information Act.

4. Frontier objects to the Request to the extent that it seeks information or documents not in the possession, custody, or control of Frontier.

5. Frontier objects to the Request to the extent that it is overly broad or seeks the production of information or documents that are not relevant to the subject of the above-referenced action or are not reasonably calculated to lead to the discovery of admissible evidence.

6. Frontier objects to the Request to the extent that it contains terms or requests that are vague or ambiguous.

7. Frontier objects to the Request to the extent that compliance with the Request would impose an undue burden or expense upon Frontier.

8. Frontier objects to the Request to the extent that it seeks to impose on Frontier any obligation to conduct additional searches for documents that Frontier may come to possess after Frontier conducts its search for documents responsive to the Request.

9. An objection to a request does not indicate in any way that documents responsive to that request exist or have ever existed.

Frontier incorporates each of the above objections by reference into each specific response set forth below. Subject to and without waiving those general objections, Frontier further objects and responds to the interrogatories and requests for production set forth in the Request as follows:

INTERROGATORIES AND REQUESTS FOR PRODUCTION

Interrogatory No. 1: Identify by name, address and telephone number all persons whom you know to have personal knowledge of the matters alleged in the Complaint.

Response: Attached as Exhibit 1 is a list of persons with personal knowledge of the matters alleged in the Complaint and available contact information. Frontier objects to identifying which FAA personnel have personal knowledge of the matters alleged in the Complaint because Complainant has – or should have – that information.

Interrogatory No. 2: Identify by title, date, author, present custodian, and content, all documents, including correspondence, obtained by you or in your possession, relating to the assertions in the Complaint, your appeal, your answer, and any affirmative defenses which you anticipate raising in this matter.

Response: Frontier is providing with these Objections and Responses the documents that it has discovered following a reasonable search that are relevant to the assertions in the Complaint, Frontier's appeal, Frontier's answer, and Frontier's affirmative defenses and that are not protected from discovery. The documents also contain reasonably available information requested above.

Frontier is withholding documents protected by the attorney-client and joint defense or common interest privileges consisting of:

- Communications soliciting or providing legal advice related to a variety of subjects including: potential settlement and legal strategy;

- Communications between and among Frontier and legal counsel seeking and offering assistance in providing information to and preparing for meetings with FAA representatives;
- Communications between and among Frontier and legal counsel analyzing meetings with FAA representatives;
- Communications related to attorney representation in this matter;

Frontier is withholding documents that are protected by the work-product doctrine consisting of:

- Marked-up drafts of documents showing attorney thought processes, including drafts of documents ultimately provided to the FAA;
- Analyses of and investigation into the underlying facts, created in anticipation of litigation;
- Documents after the date of the incident relating to efforts to discuss or resolve this matter, in anticipation of litigation, relating to communications between and among Frontier representatives and the FAA.

REQUEST FOR PRODUCTION NO. 1: Provide a copy of all documents referred to in your answer to the preceding interrogatory.

Response: Please see the Response to Interrogatory No. 2.

Interrogatory No. 3: Identify by name, address and telephone number, all persons whom you intend to have testify as a factual or expert witness in your defense at the hearing in these matter, and for factual witnesses, provide a detailed summary of each persons anticipated testimony.

Response: Attached as Exhibit 2 is a list of persons Frontier currently intends to call to testify at the hearing, as well as a general summary of the matters to which each person will likely be called to testify. The documents also contain reasonably available information requested above.

Interrogatory No. 4: Identify by title, date, author, present custodian, and content, all documents which you anticipate offering into evidence at the hearing in this matter, and through which witness or witnesses.

Response: Frontier is providing with these Objections and Responses documents in connection with Request for Production No. 2 that it intends to offer as evidence at the hearing in this matter.

REQUEST FOR PRODUCTION NO. 2: Provide a copy of all documents referred to in your answer to the preceding interrogatory.

Response: Please see the response to Interrogatory No. 4.

Interrogatory No. 5: With respect to each expert witness identified in response to Interrogatory No. 3, above, specify their specific area of expertise, and provide a synopsis of their credentials, background, training and experience.

Response: Please see the response to Interrogatory No. 3. Frontier has provided a list of persons it currently intends to call to testify at the hearing as experts, and the areas of expertise and detailed curricula vitae for the listed individuals. This information is contained in Exhibits 2 and 3.

Interrogatory No. 6: With respect to each expert you expect to call as a witness, state the subject matter on which the expert is expected to testify, and state the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each such opinion.

Response: Please see the response to Interrogatories No. 3 and 4. Frontier has provided a general summary of the matters to which each person will likely be called to testify in Exhibit 2.

Interrogatory No. 7: State by name, address, telephone number, date of conversation, and substance of conversation, all persons [other than legal counsel or spouse] with whom you have discussed the matters alleged in the complaint.

Response: Frontier objects to this interrogatory on the grounds that it is overbroad, burdensome, vague, and not reasonably calculated to lead to the discovery of admissible evidence. As the FAA is well aware, Frontier has had multiple conversations regarding the matter with various Frontier, Airbus, and FAA personnel. Its conversations with the

FAA have included discussions regarding the investigation, the investigatory process, and the enforcement action.

Interrogatory No. 8: Describe with specificity all of the facts which you anticipate presenting in the course of the hearing in this matter pertaining to the avoidance or mitigation of the sanction sought by the FAA in this case.

Response: Frontier objects to this interrogatory on the grounds that it is premature and seeks information protected from discovery by the attorney-client privilege and work product doctrine. Subject to and without waiving these objections Frontier intends to present in detail its diligent, comprehensive, and professional efforts in connection with this case, including its response to the incident and its continuous efforts to improve its safety and compliance procedures, including but not limited to the following, previously provided to the FAA:

- Conducted rigorous internal review of event and response.
- Conducted detailed review of maintenance and operational procedures with FAA and Airbus, including industry and FAA-approved best practices.
- Issued tailored letters, memoranda, training modules, and displays to Frontier employees to enhance appropriate responses and remind them of the importance of compliance and safety.
- Engaged multi-disciplinary team to review and revise Flight Operations Manual and Dispatch Operations Manual.
- Conducted new training module for Recurrent Ground School for pilots.
- VP of Flight Operations and VP Maintenance and Engineering briefed SOC personnel on appropriate operational and maintenance responses to in-flight incidents.
- Conducted independent, third-party safety audit examining safety culture and industry best practices.

Interrogatory No. 9: Describe with specificity any and all affirmative defenses you intend to assert and who are you offering as witnesses in support of these defenses? Provide the name and address of said witnesses.

Response: Frontier objects to this interrogatory on the grounds that it is premature and seeks information protected from discovery by the attorney-client privilege and work product doctrine. Subject to and without waiving its objections, Frontier identified its affirmative defenses in its Answer and its Amended Answer.

REQUEST FOR PRODUCTION NO. 3: Provide a copy of all documents referred to in your answer to the preceding two interrogatories.

Response: Please see responses to Interrogatories Nos. 8 and 9. Subject to and without waiving its objections, Frontier is providing with these Objections and Responses documents that it has discovered following a reasonable search that support avoidance and mitigation of the proposed sanction.

Interrogatory No. 10: Describe with specificity all of the documents you anticipate presenting in the course of the hearing in this matter to substantiate any financial inability to pay the proposed sanction sought by the FAA in this case.

Response: As the FAA is aware, Frontier filed a voluntary petition for Chapter 11 bankruptcy on April 10, 2008. A copy of its voluntary petition is attached hereto as Exhibit 4.

REQUEST FOR PRODUCTION NO. 4: Provide a copy of all Exhibits that you will present during the hearing in this matter.

Response: As Frontier develops its plans for the hearing, it will supplement this Response and provide Complainant with a reasonable time to review prior to hearing.

Interrogatory 12: Describe with specificity what facts or evidence Frontier relies upon in support of any affirmative defenses raised in its Answer to the Complaint.

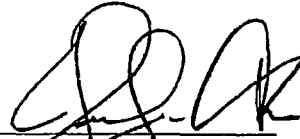
Response: Frontier objects to this interrogatory on the basis that it is cumulative and repetitious of Interrogatory No. 9. Additionally, Frontier has not completed its preparations for the hearing. Without waiving its objection, as Frontier develops its plans for the hearing, it will supplement this Response.

REQUEST FOR PRODUCTION NO. 5: Provide a copy of all documents that support your response to interrogatory 12 above.

Response: Frontier objects to this interrogatory on the basis that it is cumulative and repetitious of Request for Production No. 4. Additionally, Frontier has not completed its preparations for the hearing. Without waiving its objection, as Frontier develops its plans for the hearing, it will supplement this Response.

Frontier reserves the right to amend, expand, or delete all or any part of these objections and responses.

Respectfully submitted,



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Jennifer E. Trock
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Counsel for Frontier Airlines, Inc.

Dated: April 24, 2009

CERTIFICATE OF SERVICE

I, Timothy C. Gerheim, hereby certify that I have this, the 24th day of April, 2009, caused a copy of the foregoing document to be served to the following persons via facsimile and U.S. First Class mail:

Federal Aviation Administration
Attention: Hearing Docket Clerk, AGC-430
Wilbur Wright Building – Suite 2W1000
800 Independence Avenue, SW
Washington, DC 20591
FAX: 202-493-5142
(Original and one copy)

Scott R. Morris, Attorney
Federal Aviation Administration
Northwest Mountain Region, ANM-7
1601 Lind Avenue S.W.
Renton, WA 98057-3356
FAX: 425-227-1007

The Honorable Richard C. Goodwin
Administrative Law Judge
Office of Hearings, M-20
1200 New Jersey Avenue, S.E.
East Building Ground Floor
Room E12-320
Washington, D.C. 20590
FAX: 202-366-7536



Timothy C. Gerheim
Pillsbury Winthrop Shaw Pittman LLP
2300 N St. NW
Washington, DC 20037

Exhibit 1

Exhibit 1

Name	Address	Telephone
Andrew Ross Jr.	P.O. Box 18587, Memphis TN 38181	901-412-1991
Anthony Tucker	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Barb Cook	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Ben Dwyer	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Bill Bozen	Not Available	Not Available
Cameron Kenyon	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Casey Larson	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Chris Collins	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Dave Droegemueller	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Dave Welt	7001 Tower Road, Denver Colorado, 80249	720-374-4200
David Martin	Not Available	Not Available
Dennis Crabtree	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Doug Diehl	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Jeremy Trujillo	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Jhara Carter	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Jim Colburn	7001 Tower Road, Denver Colorado, 80249	720-374-4200
John Fisher	7001 Tower Road, Denver Colorado, 80249	720-374-4200
John Roe	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Larry Embree	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Mark Johnson	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Michael Berg	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Mike Fay	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Nathanael Lee Earp	10105 Sedalia St., Commerce City, CO 80227	720-227-4128
Norm Dawkin	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Pascal Advenier	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Philip Grant	3400 E. Sky Harbor Blvd. Terminal 3 Gate 20, Phoenix AZ 85034	602-267-0470
Phillp Larcombe	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Rick Kaumeier	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Robert Moran	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Ron McClellan	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Ron Scott	Not Available	Not Available
Rosalio Garcia	3400 E. Sky Harbor Blvd. Terminal 3 Gate 20, Phoenix AZ 85034	602-267-0470
Scott Bartos	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Stephen Swisher	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Teri Short	7001 Tower Road, Denver Colorado, 80249	720-374-4200
Will Wood	7001 Tower Road, Denver Colorado, 80249	720-374-4200

Exhibit 2

Exhibit 2				
Name	Address	Telephone	Summary of Testimony	Area of Expertise
Expert & Fact Witnesses				
John Fisher	7001 Tower Road, Denver Colorado, 80249	720-374-4200	GMM; bleed air system; engineering; maintenance; technical	Engineering; Maintenance and Maintenance Operations; AIRMAN
Rick Kaumeier	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Operation and workings of bleed air system; ECAM messages; switch operation; FOM procedures; pilot training program; Flight Ops procedures	Engineering; Operations; Training; Maintenance
Teri Short	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Technical and mechanical workings of Airbus aircraft, including but not limited to: operation of bleed air system; applicable manual requirements and procedures	Engineering; Operations; Training; Maintenance
Will Wood	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Training; bleed system from pilot perspective	Flight Ops, Operations & Procedures
Fact Witnesses				
Summary of Testimony				
Andrew Ross Jr.	P.O. Box 18587, Memphis TN 38181	901-412-1991	Logbook entries; application of MEL in MEM	
Anthony Tucker	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Operation and workings of bleed air system; ECAM messages; switch operation; FOM procedures. Actions taken on 12/26/2007.	
Cameron Kenyon	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Safety culture at Frontier; corrective actions taken; Flight Operations	
Dennis Crabtree	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Operations; Maintenance; Safety	
Mark Johnson	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Dispatch	
Nathanael Earp	10105 Sedalia St, Commerce City, Colorado, 80227	720-227-4128	MCC operations; maintenance procedures; bleed air system. Actions taken from MCC on 12/26/2007.	
Philip Larcombe	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Description of work performed in Denver	
Robert Moran	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Description of work performed in Denver	
Ron McClellan	7001 Tower Road, Denver Colorado, 80249	720-374-4200	Operations; Maintenance; Safety	
Rosalio Garcia	3400 E. Sky Harbor Blvd. Terminal 3 Gate 20, Phoenix AZ 85034	602-267-0470	Description of work performed on RON in PHX for clearing MEL on pack	

Exhibit 3

JOHN L. FISHER

254 North 17th Court
Brighton, CO 80601
303.659.0028
fishejoh@comcast.net

CAREER SUMMARY:

Technically adept maintenance and engineering professional with 25 years experience maintaining, repairing, analyzing and improving complex aircraft systems. 3 years experience in engineering and reliability and 20 plus years hands-on maintenance experience. Technical expertise spans a variety of electrical, hydraulic, pneumatic and mechanical systems and components. Abilities include technical and statistical analysis of system performance and making data driven decisions for implementing improvements.

Education includes a degree in Mathematics and Physics with concentration in Probability and Statistics. Received employer sponsored training in Six Sigma process improvement. Computer skills include general familiarity with a variety of statistical analysis, mathematical and computer drafting software programs including Minitab, SPSS, Matlab, Mathematica and VectorWorks. Competent in the use of Microsoft Office programs such as Word, Excel and PowerPoint.

WORK HISTORY:

Avionics Engineer, October 2006 – Present
Frontier Airlines, Denver, CO

Provide avionics and aircraft electrical systems engineering support. Review and implement engineering changes for product upgrades and to improve safety, reliability and maintainability. Interface with various departments to ensure timely and effective implementation of engineering changes. Provide engineering documentation, drawings and maintenance work instructions for engineering changes. Interface with manufacturers and suppliers for product upgrade and reliability related items. Report on reliability issues to all levels of management and regulatory authorities.

- Analyze flight recorder data to ensure recordings meet regulatory requirements.
- Provide electrical support including electrical load analysis for a variety of projects.
- Develop software for acquisition of aircraft performance data to meet company needs.

Reliability Analyst, May 2006 – October 2006
Frontier Airlines, Denver, CO

Collected and analyzed data used to measure aircraft, aircraft systems and component performance and reliability. Compiled and published various reports for use by company officers and regulatory agencies. Identified and monitored chronic maintenance activity through data analysis.

- Developed Excel spreadsheets to assist in effective data analysis.
- Prepared and presented monthly reliability report to management and regulatory authorities.
- Attended General Electric Aviation's Six Sigma Green Belt training course (9/06).

WORK HISTORY – continued:

Aircraft Technician, March 1998 – May 2006

Frontier Airlines, Denver, CO

As part of a team of technicians, maintained the company's fleet of 737 and A320 family aircraft. Performed scheduled and unscheduled maintenance tasks at the line maintenance level. Maintenance performed on avionics, electrical, hydraulic, pneumatic and mechanical aircraft systems. Troubleshoot and corrected complex aircraft system malfunctions and failures in a timely fashion. Followed and complied with company and manufacturer's maintenance documentation and written instructions.

- Competent in reading wiring diagrams and engineering drawings.
- Documented all work performed to meet company and regulatory requirements.
- Worked a variety of shifts and days off as part of a line maintenance team providing 24/7 coverage to support company operations.

Aircraft Technician, February 1998 – March 1998

AMR Airline Services, Denver, CO

Provided on-call and scheduled contract maintenance services for various foreign and domestic air carriers. Performed preventative maintenance to the company's ground support equipment.

Aircraft Technician, October 1995 – February 1998

Western Pacific Airlines, Colorado Springs, CO; Denver, CO

Performed scheduled and unscheduled maintenance tasks at the Line Maintenance level on the company's fleet of 737 aircraft.

Aircraft Technician, July 1987 – September 1995

Continental Airlines, Omaha, NE; Denver, CO; Los Angeles, CA; Cleveland, OH

Performed scheduled and unscheduled maintenance tasks at the line maintenance level on the company's fleet of 727, 737, DC9, MD80, A300 and DC10 aircraft.

- In Omaha (7/87 - 1/90), was involved with daily station reporting, conference calls and shipping and receiving of aircraft parts and tooling.
- In the Accessory Shop (Denver 2/90 - 6/90), overhauled and tested various hydraulic, pneumatic and mechanical components. Employee of the month April 1990.
- While working line maintenance in Denver (7/90 - 9/93), performed heavy overnight workload such as engine and landing gear replacement.
- Performed heavy and line maintenance support on the company's narrowbody aircraft in Los Angeles (10/93 - 4/94).

Aircraft Technician, April 1985 – June 1987

Royale Airlines, Shreveport, LA; New Orleans, LA

Performed scheduled and unscheduled maintenance tasks at the line maintenance level on the company's fleet of Embraer Bandeirante (EMB110) and Gulfstream G-1 fleets.

- Shift Foreman in New Orleans (7/85 - 6/87).

Aircraft Technician, April 1984 – March 1985

American Central Airlines, Omaha, NE

Performed scheduled and unscheduled maintenance tasks at the line maintenance level on the company's fleet of Embraer Bandeirante (EMB110) and Piper Navajo fleets.

EDUCATION:

- Bachelor of Science, Mathematics and Physics
Metropolitan State College of Denver, Denver CO
Graduated May 2006
- Airframe and Powerplant Mechanics
Colorado Aero Tech, Broomfield, CO
Graduated November 1983

LICENSES/CERTIFICATES:

- Federal Aviation Administration (FAA), Airframe and Powerplant Certificate, January 1984
- Federal Communications Commission (FCC), General Radiotelephone Operators License (GROL)
with Radar Endorsement, December 1997

RICHARD D. KAUMEIER

2842 West Long Drive F, Littleton, CO 80120
(303) 797-3797
rkaumeier@flyfrontier.com

SUMMARY

Thirty plus years of experience in aviation, electronics, technical writing, and technical instruction.

EMPLOYMENT

Flight Operations Technical Project Manager
Frontier Airlines, Inc.

Years Employed: 2006-Present
Denver, CO

Conducted research and provided formal written and verbal follow-up to Frontier management, the pilot group, the manufacturer, and the Federal Aviation Administration in response to aircraft technical issues, policy and procedure questions, and FAA regulations related to the operation of Frontier's Airbus fleet. Distilled extensive technical publications into concise training and reference materials supplied to line pilots. Evaluated line pilot reports and wrote training briefs based upon issues raised therein. Programmed and maintained the Airbus fleet AOC database and the ARINC Op Center interface for Frontier's ACARS communications. Proficient in all Microsoft Office applications, Windows Vista, Windows XP, Windows 2000, Mac OS X, UNIX, Linux, and in general computer networking issues. Currently studying to test for an FAA Airframe certificate.

Ground School Instructor
Frontier Airlines, Inc.

Years Employed: 2005-2006
Denver, CO

Responsible for instructing new hire and recurrent ground school courses. Taught all aspects of Airbus systems, aircraft performance, water survival, security, and general subjects to Frontier's pilot group of 700+ individuals and those FAA representatives tasked with the oversight of Frontier's flight operations. Conducted comprehensive review sessions to prepare pilots for orals prior to their check rides. Developed flight operations courseware and reference materials for use in ground school classes. Received a formal letter of appreciation from the FAA A320 APM for performance as a ground school instructor.

Maintenance Instructor
Frontier Airlines, Inc.

Years Employed: 2000-2005
Denver, CO

Solely responsible for teaching avionics courses to 400+ Frontier mechanics, Frontier's contract maintenance employees throughout the United States and Mexico, and those FAA representatives tasked with the oversight of Frontier's maintenance operations. Certified mechanics in engine run and taxi for the Boeing 737-200, 737-300, and Airbus A318/A319 in both Level D simulators and on the actual aircraft. Developed the courseware for and taught Frontier's initial Category II/III troubleshooting and repair classes. Developed aircraft maintenance courseware, reference materials, and taught avionics familiarization and troubleshooting courses integral to Frontier's transition from a Boeing to an Airbus fleet. Created curriculum and documentation establishing a formal on-the-job training program for Frontier's mechanics. Performed hardware and software maintenance, configuration, and updates to a Faros/Wicat Airbus A320 flight training device used for training both pilots and mechanics. Recipient of the FAA Diamond Award for aircraft maintenance training for six consecutive years (2000-2005). Received a formal letter of appreciation from the FAA PAI for performance as a maintenance instructor.

Avionics Technician
Frontier Airlines, Inc.

Years Employed: 2000
Denver, CO

Provided overnight diagnosis and repair of Boeing 737-200 and 737-300 avionics systems as an avionics technician. Implemented hardware and software changes to aircraft in accordance with Engineering Orders and Fleet Campaign Directives. Mentored and provided on-the-job training for newly hired avionics technicians.

Lead Field Service Technician
Frontier Radio

Years Employed: 1997-2000
Englewood, CO

Provided on-site installation and repair of radio frequency voice and data communications systems at customer locations throughout the metro Denver area, and component level repair of mobile and portable radios as a bench technician. Developed and maintained technical documentation for those systems built by Frontier, and reverse engineered and documented systems designed by others. Proposed, researched, and wrote feasibility and design studies for new RF sites. Diagnosed and repaired hardware and software faults on Intel based computers running MS-DOS, Windows 95 and 98, Windows NT, UNIX, and Linux. Responsible for the training and supervision of junior technicians.

Field Service Technician
Motorola Communications and Electronics

Years Employed: 1990-1997
Orlando, FL

Expedited the repair of county-wide public safety communications systems as a technician on 24-hour call. Performed component level repair on a diverse line of equipment ranging from HF single sideband to 6 GHz digital microwave. Produced and continuously updated technical documents detailing the construction, organization, interconnectivity, and operation of those communications sites under my maintenance. Diagnosed and repaired hardware & software faults on a variety of computer systems running MS-DOS, Windows 95, Windows NT, Mac OS, and UNIX.

Electronics Instructor
San Diego Community College District

Years Employed: 1988-1990
Orlando, FL

Developed courseware and taught theoretical and applied basic electricity and electronics to United States Navy and Marine Corps students as a government contract instructor at Naval Training Center Orlando. Counseled and provided additional tutoring to those students experiencing difficulty with the academic curriculum. Wrote interactive software used for classroom demonstration of the normal and abnormal operation of basic electronic circuits.

Avionics Maintenance Instructor
United States Navy

Years Employed: 1984-1988
Jacksonville, FL

Developed courseware, publications, and documentation and taught the initial F/A-18A communications, navigation, and identification avionics classes offered to East Coast technicians transitioning to Hornet squadrons. Instructed a course detailing computer assisted troubleshooting of F/A-18 avionics systems using the AN/USM-470 Automatic Test System, and performed maintenance, software updates, and hardware upgrades to the same. Consistently placed among the top 5% of my peers in formal instructor evaluations conducted by senior enlisted personnel attached to my command. Honorably discharged as an Aviation Electronics Technician First Class.

Aviation Electronics Technician
United States Navy

Years Employed: 1979-1984
Jacksonville, FL

Performed system and component level troubleshooting and repair of radar for the S3-A Viking aircraft both ashore and afloat while deployed aboard the aircraft carrier USS Independence. Worked as a S-3A avionics line troubleshooter ashore at Naval Air Station Cecil Field in Jacksonville. Developed and taught technical and military training programs as a collateral duty instructor while aboard ship, and was responsible for maintaining the work center technical publication library ashore.

LICENSES AND CERTIFICATION

- FAA Private Pilot Certificate (Airplane Single Engine Land)
- FCC General Radiotelephone Operator License with Radar Endorsement
- FCC Amateur Radio Extra Class License KØVJ
- NASA "D" Level micro-miniature electronic component repair certification
- State of California certification as an adult education instructor (electronics)

Teri Marie Short
12089 Rockdale St., - Parker, Colorado 80138
Home: (303) 805-3574

QUALIFICATIONS

Experienced, results-oriented leader with proven success in managing all aspects of planning, coordinating, and directing Engineering and Maintenance Support Operations. Proven problem solver with demonstrated ability to meet commitments, build & motivate teams, and achieve corporate objectives. Background includes strong experience in regulatory compliance to include FAA and EASA bilateral agreements, aircraft maintenance and troubleshooting, and supplemental type certification. Additional expertise in:

- Maintenance Programs
- Reliability Programs
- Aircraft Acquisition
- Project & Line Support Engineering
- Process Improvement
- Regulatory Compliance
- Project Planning
- Employee Development
- Effective Communication, Rapport-building & Influencing Skills

CAREER ACCOMPLISHMENTS

- Increased departmental productivity by 50% through standardization and streamlining of processes.
- Restructured Aircraft Records department and implemented ATOS procedures resulting in approximately 30% reduction in paperwork compliance issues.
- Implemented new planning software which provided accurate and timely hanger planning, resulting in a \$1.5M annual savings.
- Authored and implemented EPA Safe Drinking Water Program for Major Airline which met EPA requirements, addressed the needs of our customers, and decreased corporate risk.
- Worked closely with a major aircraft manufacturer to implement blanket "Alternate Means of Compliance" procedures for U.S. operators, reducing the need for each operator to obtain individual approvals thus eliminating bottlenecks, decreasing costs, and improving productivity.
- As a certified, volunteer company trainer, trained over 100 managers, directors, and executive level personnel in the "Mindset of Leadership" program, a large-scale, strategic change Initiative.

PROFESSIONAL EXPERIENCE

Frontier Airlines, Inc., Denver, Colorado

2004 - Present

Senior Director of Engineering and Planning (2005 - Present)

- Directed six departments in development and successful delivery of maintenance and operation support.
- Increased support and productivity by defining and writing departmental procedures. Successfully implemented FAA regulatory procedures resulting in an exemplary Airworthiness Directive compliance and tracking.
- Key company interface and well established professional working relationship with the FAA. Successfully implemented several major aircraft alteration/modification programs.

Director of Engineering and Technical Programs (2004 - 2005)

- Responsible for all aspects of Engineering, Maintenance Programs, Aircraft Records and Reliability.
- Managed engineering in the investigation, execution of modifications and repairs, while ensuring regulatory compliance for all related equipment and aircraft.
- Ensured all heavy check maintenance hanger plans were flowed to achieve the highest level of utilization and cost efficiency.

Continental Airlines, Inc., Houston, Texas

1989 - 2004

Teri Marie Short

12089 Rockdale St., - Parker, Colorado 80138

Home: (303) 805-3574

Senior Manager, Systems Engineering (1998 - 2004)

Managed 13 Systems Engineers in the investigation, design, execution of modification and repairs to aircraft systems and related equipment. Provided technical engineering advice, services, and support to other divisions and personnel involved with aircraft systems. Review and approved documents for regulatory compliance.

Master Engineer, Systems Engineering (1995 - 1998)

Developed specifications, basic design data, documents and performed all engineering duties necessary to repair, modify and maintain aircraft systems (pneumatics, landing gear and fuel systems). Provide support to Base Maintenance check lines and component repair shops. Provided engineering support and documentation ensuring that all aircraft and components maintained airworthiness design configuration.

Fleet Manager (1994 - 1995)

Responsible for major project coordination, critical design review, and modification plan pertaining to all aircraft component modifications and shop support. Acted as liaison between all technical, planning and financial departments for project coordination and accomplishment.

Senior Engineer, Service Engineering (1991 - 1994)

Responsible for all Line Maintenance and support shop engineering. Duties included review of service documents, production of aircraft and shop specification, repair and modification instructions for pneumatics, landing gear, interior and fuel systems.

Senior Engineer, Reliability Engineering (1988 - 1991)

Responsible for B737 trend analysis, system reliability monitoring and aircraft reliability modifications.

Air Treads, Inc. - Houston, Texas

1987 - 1989

Quality Assurance Manager (1987- 1989)

Assisted in establishing an FAA 145 Repair Station for Aircraft Wheel and Brake repair and overhaul. ASTM Level II, Certified in NDT inspection. Managed inspection department in the inspection and re-certification of large aircraft wheels, tires and brakes. Responsible for Technical Publications, training, customer and manufacturer coordination and product damage evaluation.

U.S. Army National Guard

1982 - 2005

Retired at the rank of Lieutenant Colonel.

Served as a Battalion Commander for a heavy maintenance, medical and service support battalion. Responsible for over 540 soldiers; conducted training, managed operations planning, maintenance, and logistical support. Extensive military training in logistics planning and execution. Top Secret Security Clearance.

EDUCATION

- Bachelor of Science in Aviation Technology and Operations, August 1985
Western Michigan University, Kalamazoo, Michigan
- Command and General Staff College, August 2001
U.S. Army

TRAINING

- Mindset of Leadership, Certification, 2007
- Airbus A318/A319 Training, 2004
- FAA Part 21 Seminar, February 2003
- DER Seminars, 2003 and 2008
- B737NG Airframe & Powerplant Course, 1999
- Garret Pneumatics Course, 1991
- B737 Avionics & Electrical Course, 1990
- B737 Airframe & Powerplant Course, 1989

WILLIAM BARRY WOOD, JR.

5309 Gould Circle, Castle Rock, Colorado 80109

Home: 303.470.6728 • Mobile: 720.209.7112

flywood@gmail.com

AVIATION CREDENTIALS

FAA CERTIFICATES

- Airline Transport Pilot (AMEL, Type Ratings: Airbus A-320, Embraer EMB-145)
- FAA-Designated Simulator Check Airman (Airbus A320)
- FAA-Designated Line Check Airman (Airbus A320)
- Flight Instructor (Airplane-Single & Multi-Engine, Instrument)
- Ground Instructor (Advanced & Instrument)
- Restricted Radiotelephone Operator's Permit
- Aircraft Dispatcher
- FAA Medical Certificate First Class (No Limitations)

FLIGHT EXPERIENCE

More than 6,600 hours in (primarily) EMB-145, B-737, and A-320 Series aircraft.

Pilot in Command	3,200+ hours	Multi-Engine	5,700+ hours
Second in Command	3,300+ hours	Flight Instructor	500+ hours
Turbine	5,500+ hours		

PROFESSIONAL EXPERIENCE

Frontier Airlines, Inc. (Denver, Colorado – January 2001 to Present)

Assistant Chief Pilot/Senior Standards Captain/A320 Fleet Manager

- Airbus-Frontier technical and procedural liaison.
- FAA-Frontier technical, procedural, and standardization liaison.
- Frontier A320 technical and procedural Subject Matter Expert (SME).
- Pilot-Management and interdepartmental technical interface.
- Procedural and policy development and implementation (Flight Operations Manuals).
- Development and maintenance of line and simulator training and evaluation programs.
- Development of pilot and check airman standardization programs.
- Line and Simulator Check Airman training and evaluation.
- Line Check administration to all check airmen.
- Line and Simulator Check Airmen performance review.
- Line Pilot supervision and contract compliance administration.
- Airbus Technical Project Manager supervision.

Line Check Airman/Simulator Check Airman

- Pilot training, evaluation, and certification (Line Checks, Proficiency Training, Proficiency Checks).

(Continued)

William Barry Wood, Jr.

(Page 2)

PROFESSIONAL EXPERIENCE (continued)

Continental Express Airlines, Inc. *(Houston, Texas – September 1997 to January 2001)*

Captain/Line Check Airman

- CLE/EWR/IAH based operation of EMB-145/135 and ATR-42/72 aircraft.

Jeppesen Sanderson, Inc. *(Englewood, Colorado – February 1992 to September 1997)*

Airline Operations Analyst

- Airline customer support of online computer flight planning, weather, flight dispatching, and flight tracking systems.
 - ⇒ JetPlan
 - ⇒ Flight Control
 - ⇒ On-Sight

Felber Motivation, Inc. *(Colorado Springs, Colorado – September 1996 to September 1997)*

Corporate Pilot

- FAR Part 91 corporate operation of a Beech King Air 200.

Wings of Denver/P.C. Flyers *(Englewood, Colorado – February 1993 to September 1997)*

Flight Instructor/Ground Instructor

- Private, Instrument, Commercial, and Multi-engine flight and ground instruction.
- Biennial Flight Reviews
- Instrument Competency Checks

EDUCATION

Metropolitan State College of Denver *(Denver, Colorado – August 1988 to December 1991)*

Bachelor of Science - Aeronautical Sciences

Accounting Minor

University of Colorado *(Boulder, Colorado – August 1987 to May 1988)*

Prerequisite Coursework – Business Emphasis

EDUCATIONAL ACHIEVEMENTS

- Vice-Presidential Honor Roll
- Colorado Scholars Academic Scholarship
- Mindset of Leadership
- Lean Six Sigma

Exhibit 4

United States Bankruptcy Court Southern District of New York				Voluntary Petition	
Name of Debtor (if individual, enter Last, First, Middle): Frontier Airlines Holdings, Inc.			Name of Joint Debtor (Spouse) (Last, First, Middle):		
All Other Names used by the Debtor in the last 8 years (include married, maiden, and trade names): N/A			All Other Names used by the Joint Debtor in the last 8 years (include married, maiden, and trade names):		
Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all): 20-4191157			Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all):		
Street Address of Debtor (No. & Street, City, and State): 7001 Tower Road Denver, Colorado			Street Address of Joint Debtor (No. & Street, City, and State):		
ZIP CODE 80249			ZIP CODE		
County of Residence or of the Principal Place of Business: Denver County			County of Residence or of the Principal Place of Business:		
Mailing Address of Debtor (if different from street address):			Mailing Address of Joint Debtor (if different from street address):		
ZIP CODE			ZIP CODE		
Location of Principal Assets of Business Debtor (if different from street address above):			ZIP CODE		
Type of Debtor (Form of Organization) (Check one box.)			Nature of Business (Check one box.)		
<input type="checkbox"/> Individual (includes Joint Debtors) <i>See Exhibit D on page 2 of this form.</i> <input checked="" type="checkbox"/> Corporation (includes LLC and LLP) <input type="checkbox"/> Partnership <input type="checkbox"/> Other (If debtor is not one of the above entities, check this box and state type of entity below.)			<input type="checkbox"/> Health Care Business <input type="checkbox"/> Single Asset Real Estate as defined in 11 U.S.C. § 101(51B) <input type="checkbox"/> Railroad <input type="checkbox"/> Stockbroker <input type="checkbox"/> Commodity Broker <input type="checkbox"/> Clearing Bank <input checked="" type="checkbox"/> Other <div style="text-align: center;"><u>Airline</u></div> <input type="checkbox"/> Tax-Exempt Entity (Check box, if applicable.) <input type="checkbox"/> Debtor is a tax-exempt organization under Title 26 of the United States Code (the Internal Revenue Code).		
Chapter of Bankruptcy Code Under Which the Petition is Filed (Check one box)			<input type="checkbox"/> Chapter 7 <input type="checkbox"/> Chapter 9 <input checked="" type="checkbox"/> Chapter 11 <input type="checkbox"/> Chapter 12 <input type="checkbox"/> Chapter 13		
<input type="checkbox"/> Chapter 15 Petition for Recognition of a Foreign Main Proceeding <input type="checkbox"/> Chapter 15 Petition for Recognition of a Foreign Nonmain Proceeding			Nature of Debts (Check one box)		
<input type="checkbox"/> Debts are primarily consumer debts, defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."			<input checked="" type="checkbox"/> Debts are primarily business debts.		
Filing Fee (Check one box.)			Chapter 11 Debtors		
<input checked="" type="checkbox"/> Full Filing Fee attached <input type="checkbox"/> Filing Fee to be paid in installments (applicable to individuals only). Must attach signed application for the court's consideration certifying that the debtor is unable to pay fee except in installments. Rule 1006(b). See Official Form 3A. <input type="checkbox"/> Filing Fee waiver requested (Applicable to chapter 7 individuals only). Must attach signed application for the court's consideration. See Official Form 3B.			Check one box: <input type="checkbox"/> Debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). <input checked="" type="checkbox"/> Debtor is not a small business debtor as defined in 11 U.S.C. § 101(51D). Check if: <input type="checkbox"/> Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,190,000. Check all applicable boxes: <input type="checkbox"/> A plan is being filed with this petition. <input type="checkbox"/> Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).		
Statistical/Administrative Information					THIS SPACE IS FOR COURT USE ONLY
<input checked="" type="checkbox"/> Debtor estimates that funds will be available for distribution to unsecured creditors. <input type="checkbox"/> Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.					
Estimated Number of Creditors					
<input checked="" type="checkbox"/> 1-49	<input type="checkbox"/> 50-99	<input type="checkbox"/> 100-199	<input type="checkbox"/> 200-999	<input type="checkbox"/> 1,000-5,000	<input type="checkbox"/> 5,001-10,000
<input type="checkbox"/> 10,001-25,000	<input type="checkbox"/> 25,001-50,000	<input type="checkbox"/> 50,001-100,000	<input type="checkbox"/> 100,001-500,000	<input type="checkbox"/> 500,001-1,000,000	<input type="checkbox"/> Over 1,000,000
Estimated Assets					
<input type="checkbox"/> \$0 to \$50,000	<input type="checkbox"/> \$50,001 to \$100,000	<input type="checkbox"/> \$100,001 to \$500,000	<input type="checkbox"/> \$500,001 to \$1 million	<input type="checkbox"/> \$1,000,001 to \$10 million	<input type="checkbox"/> \$10,000,001 to \$50 million
<input type="checkbox"/> \$50,000,001 to \$100 million	<input type="checkbox"/> \$100 million to \$500 million	<input type="checkbox"/> \$500 million to \$1 billion	<input type="checkbox"/> \$1 billion to \$5 billion	<input type="checkbox"/> \$5 billion to \$10 billion	<input type="checkbox"/> More than \$10 billion
Estimated Liabilities					
<input type="checkbox"/> \$0 to \$50,000	<input type="checkbox"/> \$50,001 to \$100,000	<input type="checkbox"/> \$100,001 to \$500,000	<input type="checkbox"/> \$500,001 to \$1 million	<input type="checkbox"/> \$1,000,001 to \$10 million	<input type="checkbox"/> \$10,000,001 to \$50 million
<input type="checkbox"/> \$50,000,001 to \$100 million	<input type="checkbox"/> \$100 million to \$500 million	<input type="checkbox"/> \$500 million to \$1 billion	<input type="checkbox"/> \$1 billion to \$5 billion	<input type="checkbox"/> \$5 billion to \$10 billion	<input type="checkbox"/> More than \$10 billion

Voluntary Petition <i>(This page must be completed and filed in every case)</i>		Name of Debtor(s): Frontier Airlines Holdings, Inc.	
All Prior Bankruptcy Cases Filed Within Last 8 Years (If more than two, attach additional sheet.)			
Location Where Filed: N/A	Case Number: N/A	Date Filed: N/A	
Location Where Filed: N/A	Case Number: N/A	Date Filed: N/A	
Pending Bankruptcy Case Filed by any Spouse, Partner, or Affiliate of this Debtor (If more than one, attach additional sheet.)			
Name of Debtor: See Attachment 1	Case Number: Not yet assigned	Date Filed:	
District: Southern District of New York	Relationship: Affiliates	Judge: Not yet assigned	
Exhibit A (To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 and is requesting relief under chapter 11.) <input checked="" type="checkbox"/> Exhibit A is attached and made a part of this petition.		Exhibit B (To be completed if debtor is an individual whose debts are primarily consumer debts.) I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter. I further certify that I have delivered to the debtor the notice required by 11 U.S.C. § 342(b). X _____ <div style="display: flex; justify-content: space-between;"> Signature of Attorney for Debtor(s) Date </div>	
Exhibit C			
Does the debtor own or have possession of any property that poses or is alleged to pose a threat of imminent and identifiable harm to public health or safety? <input type="checkbox"/> Yes, and Exhibit C is attached and made a part of this petition. <input checked="" type="checkbox"/> No			
Exhibit D			
(To be completed by every individual debtor. If a joint petition is filed, each spouse must complete and attach a separate Exhibit D.) <input type="checkbox"/> Exhibit D completed and signed by the debtor is attached and made a part of this petition. If this is a joint petition: <input type="checkbox"/> Exhibit D also completed and signed by the joint debtor is attached and made a part of this petition.			
Information Regarding the Debtor - Venue (Check any applicable box.)			
<input type="checkbox"/> Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District. <input checked="" type="checkbox"/> There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District. <input type="checkbox"/> Debtor is a debtor in a foreign proceeding and has its principal place of business or principal assets in the United States in this District, or has no principal place of business or assets in the United States but is a defendant in an action or proceeding [in a federal or state court] in this District, or the interests of the parties will be served in regard to the relief sought in this District.			
Certification by a Debtor Who Resides as a Tenant of Residential Property (Check all applicable boxes.)			
<input type="checkbox"/> Landlord has a judgment against the debtor for possession of debtor's residence. (If box checked, complete the following.) <div style="margin-left: 40px;"> _____ (Name of landlord that obtained judgment) _____ (Address of landlord) </div>			
<input type="checkbox"/> Debtor claims that under applicable nonbankruptcy law, there are circumstances under which the debtor would be permitted to cure the entire monetary default that gave rise to the judgment for possession, after the judgment for possession was entered, and <input type="checkbox"/> Debtor has included with this petition the deposit with the court of any rent that would become due during the 30-day period after the filing of the petition. <input type="checkbox"/> Debtor certifies that he/she has served the Landlord with this certification. (11 U.S.C. § 362(1)).			

Voluntary Petition <i>(This page must be completed and filed in every case)</i>	Name of Debtor(s): <u>Frontier Airlines Holdings, Inc</u>
Signatures	
<p style="text-align: center;">Signature(s) of Debtor(s) (Individual/Joint)</p> <p>I declare under penalty of perjury that the information provided in this petition is true and correct. [If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12 or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7. [If no attorney represents me and no bankruptcy petition preparer signs the petition] I have obtained and read the notice required by 11 U.S.C. § 342(b).</p> <p>I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.</p> <p>X _____ Signature of Debtor</p> <p>X _____ Signature of Joint Debtor</p> <p>_____ Telephone Number (if not represented by an attorney)</p> <p>_____ Date</p>	<p style="text-align: center;">Signature of a Foreign Representative</p> <p>I declare under penalty of perjury that the information provided in this petition is true and correct, that I am the foreign representative of a debtor in a foreign proceeding, and that I am authorized to file this petition.</p> <p>(Check only one box.)</p> <p><input type="checkbox"/> I request relief in accordance with chapter 15 of title 11, United States Code. Certified copies of the documents required by 11 U.S.C. § 1515 are attached.</p> <p><input type="checkbox"/> Pursuant to 11 U.S.C. § 1511, I request relief in accordance with the chapter of title 11 specified in this petition. A certified copy of the order granting recognition of the foreign main proceeding is attached.</p> <p>X _____ Signature of Foreign Representative</p> <p>_____ Printed Name of Foreign Representative</p> <p>_____ Date</p>
<p style="text-align: center;">Signature of Attorney*</p> <p>X <u>/s/ Marshall S. Huebner</u> Signature of Attorney for Debtor(s) <u>Marshall S. Huebner</u> Printed Name of Attorney for Debtor(s) <u>Davis Polk & Wardwell</u> Firm Name <u>450 Lexington Avenue, New York, NY 10017</u> Address <u>212-450-4000</u> Telephone Number <u>April 10, 2008</u> Date</p> <p>*In a case in which § 707(b)(4)(D) applies, this signature also constitutes a certification that the attorney has no knowledge after an inquiry that the information in the schedules is incorrect.</p>	<p style="text-align: center;">Signature of Non-Attorney Bankruptcy Petition Preparer</p> <p>I declare under penalty of perjury that: (1) I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110; (2) I prepared this document for compensation and have provided the debtor with a copy of this document and the notices and information required under 11 U.S.C. §§ 110(b), 110(h), and 342(b); and, (3) if rules or guidelines have been promulgated pursuant to 11 U.S.C. § 110(h) setting a maximum fee for services chargeable by bankruptcy petition preparers, I have given the debtor notice of the maximum amount before preparing any document for filing for a debtor or accepting any fee from the debtor, as required in that section. Official form 19 is attached.</p> <p>_____ Printed Name and title, if any, of Bankruptcy Petition Preparer</p> <p>_____ Social-Security number (If the bankruptcy petition preparer is not an individual, state the Social-Security number of the officer, principal, responsible person or partner of the bankruptcy petition preparer.) (Required by 11 U.S.C. § 110.)</p> <p>_____ Address</p> <p>X _____ Date</p> <p>_____ Signature of Bankruptcy Petition Preparer or officer, principal, responsible person, or partner whose Social-Security number is provided above.</p> <p>Names and Social-Security numbers of all other individuals who prepared or assisted in preparing this document unless the bankruptcy petition preparer is not an individual</p> <p>If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.</p> <p><i>A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both 11 U.S.C. § 110; 18 U.S.C. § 156.</i></p>
<p style="text-align: center;">Signature of Debtor (Corporation/Partnership)</p> <p>I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.</p> <p>The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.</p> <p>X <u>/s/ Edward M. Christle, III</u> Signature of Authorized Individual <u>Edward M. Christle, III</u> Printed Name of Authorized Individual <u>Senior Vice President, Finance</u> Title of Authorized Individual <u>April 10, 2008</u> Date</p>	

Exhibit "A" to Voluntary Petition

1. If any of the Debtor's securities are registered under Section 12 of the Securities Exchange Act of 1934. The

SEC file number is: 000-51890.

2. The following financial data is the latest available information and refers to the debtor's condition on December 31, 2007.

a. Total assets	<u>598,331,466</u>	
b. Total debts (including debts listed in 2.c., below)	<u>592,260,969</u>	
c. Debt securities held by more than 500 holders.		Approximate number of holders
secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated <input type="checkbox"/>	\$ Unknown	
secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated <input type="checkbox"/>	\$	
secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated <input type="checkbox"/>	\$	
secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated <input type="checkbox"/>	\$	
secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated <input type="checkbox"/>	\$	
secured <input type="checkbox"/> unsecured <input type="checkbox"/> subordinated <input type="checkbox"/>	\$	
d. Number of shares of preferred stock	None issued; 1,000,000 shares authorized.	
e. Number of shares common stock	<u>8,614,524</u> (as of December 31, 2007)	

Comments, if any:

3. Brief description of debtor's business:

A low cost, affordable fare airline operating primarily in a hub and spoke fashion
connecting cities coast to coast through their hub at Denver International Airport.

4. List the names of any person who directly or indirectly owns, controls, or holds, with power to vote, 5% or more of the voting securities of debtor (all information on this table comes from the Proxy Statement filed by the Company on July 27, 2007):

SHAREOWNER	SHARES BENEFICIALLY OWNED	% OF OWNERSHIP
FMR Corp.	3,684,813 (1)	10.071%
Donald Smith & Co., Inc.	3,658,672 (2)	9.99%
Dimensional Fund Advisors LP	3,137,661 (3)	8.58%
Technology Pioneer Corp.	2,729,627 (4)	7.50%
T. Rowe Price Associates, Inc.	2,671,200 (5)	7.20%
Lord, Abnett & Co. LLC	2,529,804 (6)	6.91%
Yong Ping Duan/Enlight Foundation	2,474,859 (7)	7.50%
Barclays Global Investors, NA	2,005,419 (8)	5.47%
CNH Partners, LLC	1,961,693 (9)	5.09%

1 Reflects beneficial ownership as of December 31, 2006. Information with respect FMR Corp., Edward C. Johnson 3d, Fidelity Management & Research Company and Fid Balanced Equity Sub is based solely on a Schedule 13G filed with the Securities and Exchange Commission on February 14, 2007.

2 Reflects beneficial ownership as of December 31, 2006. Information with respect to Donald Smith & Co., Inc. is based solely on a Schedule 13G filed with the Securities and Exchange Commission on February 13, 2007.

3 Reflects beneficial ownership as of December 31, 2006. Information with respect to Dimensional Fund Advisors LP, f/k/a Dimensional Fund Advisors Inc. (DFA), is based solely on a Schedule 13G filed with the Securities and Exchange Commission on February 2, 2007. The Schedule 13G notes that these shares are owned by various individual and institutional investors that DFA serves as investment adviser with power to direct investments and/or sole power to vote the shares. For purposes of reporting requirements under the Exchange Act, DFA may be deemed to be a beneficial owner of these shares; DFA, however, expressly disclaims that it is the beneficial owner of these shares.

4 Reflects beneficial ownership as of February 27, 2007. Information with respect to Technology Pioneer Corp. and Lei Ding is based solely on a Schedule 13G filed with the Securities and Exchange Commission on March 22, 2007.

5 Reflects beneficial ownership as of December 31, 2006. Information with respect to T. Rowe Price Associates Inc. is based solely on a Schedule 13G filed with the Securities and Exchange Commission on February 12, 2007.

6 Reflects beneficial ownership as of December 31, 2006. Information with respect to Lord, Abnett & Co. LLC is based solely on a Schedule 13G filed with the Securities and Exchange Commission on February 14, 2007.

7 Reflects beneficial ownership as of June 13, 2007. Information with respect to Yong Ping Duan and Enlight Foundation is based solely on a Schedule 13G filed with the Securities and Exchange Commission on June 18, 2007.

8 Reflects beneficial ownership as of December 31, 2006. Information with respect to Barclays Global Investors, NA, Barclays Global Fund Advisors and Barclays Global Investors, Ltd. is based solely on a Schedule 13G filed with the Securities and Exchange Commission on January 23, 2007. The address of Barclays Global Investors, Ltd. is Murray House, 1 Royal Mint Court, London, EC3N 4HH.

9 Reflects beneficial ownership as of December 31, 2006. CNH Partners, LLC and CNH CA Master Account, L.P. beneficially own 1,961,693 debt securities that are convertible into 1,961,693 shares of our common stock. Information with respect to CNH Partners, LLC and CNH CA Master Account, L.P. is based solely on a Schedule 13G filed with the Securities and Exchange Commission on February 7, 2007.

ATTACHMENT 1

PENDING OR CONCURRENT BANKRUPTCY CASES FILED BY AFFILIATES

On the date hereof, each of the affiliated entities listed below (including the debtor in this chapter 11 case) filed a voluntary petition for relief under title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York. A motion has been filed with the Court requesting that the chapter 11 cases of these entities be jointly administered.

Entity Name	Case Number	Judge
Frontier Airlines, Inc.	Not yet assigned	Not yet assigned
Lynx Aviation, Inc.	Not yet assigned	Not yet assigned

X
:
In re: :
:
Chapter 11 Case No.
:
FRONTIER AIRLINES : 08-____()
HOLDINGS, INC., :
:
Debtor. :
:
X

The following is a list of creditors holding the 30 largest general unsecured claims against the Debtors. This list has been prepared from the books and records of the Debtors.

This list reflects the information existing and available as of April 10, 2008. The Company reserves the right to amend this list based on information existing as of the filing date.

The information presented herein, including the failure of the Company to list any claim as contingent, unliquidated or unknown, does not constitute an admission or waiver of the Company's right to contest the validity, priority or amount of any claim.

Creditor	Amount	Disputed Unliquidated Contingent
1. Wells Fargo	\$93,491,208.79	
2. Treasurer City & County of Denver	\$2,408,887.38	
3. Total Petrochemicals Inc.	\$2,366,875.29	
4. Airport Revenue Fund	\$1,817,919.59	
5. World Fuel Services Inc. - Wire	\$1,557,138.66	
6. Servisair USA Inc.	\$998,063.47	
7. BE Aerospace Inc.	\$758,646.67	
8. Sabre Inc.	\$697,557.83	
9. Morgan Stanley Capital Group Inc	\$662,655.00	
10 Gallileo International	\$613,522.98	
11 Airbus Services	\$337,636.48	
12 Pinnacol Assurance	\$312,669.30	
13 LIEBHERR	\$249,817.00	
14 TRAX USA Corporation	\$244,756.15	
15 Contego Systems LLC	\$232,708.12	
16 BF Goodrich	\$220,228.99	
17 Thales Avionics Inc.	\$183,436.40	
18 City of Houston	\$177,489.59	
19 Metropolitan Trustee	\$164,954.95	
20 Vedder Price PC	\$151,500.00	
21 Civil Aviation Training Solutions	\$149,102.10	
22 ASIG	\$139,599.42	

Creditor	Amount	Disputed Unliquidated Contingent
23 SAN San Diego-Lindbergh International Airport	\$123,400.72	
24 G and K Services Lug LLC	\$122,189.61	
25 LaGuardia Airport	\$117,372.83	
26 Tug Technologies Corp	\$115,153.43	
27 KPMG LLP	\$115,000.00	
28 Michael Lewis Co	\$111,105.71	
29 Deloitte Consulting LLP	\$108,748.43	
30 Vancouver International Airport Authority	\$106,768.56	

I, the undersigned authorized officer of the Company, named as the debtor in this case, declare under penalty of perjury that I have reviewed the foregoing and that it is true and correct to the best of my knowledge, information and belief, with reliance on appropriate corporate officers.

Dated: New York, New York
April 10, 2008

/s/ Edward M. Christie, III
Edward M. Christie III
Senior Vice President, Finance

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

FRONTIER AIRLINES
HOLDINGS, INC.,

Debtor.

----- X
:
:
: Chapter 11 Case No.
:
: 08-____ ()
:
:
:
:
----- X

CORPORATE OWNERSHIP STATEMENT

In accordance with Rule 1007(a)(1) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 1007-3, Frontier Airlines Holdings, Inc. (the "Company") hereby states that the following corporations directly or indirectly own 10% or more of the Company's equity interests as of July 27, 2007:

- FMR Corp.

The Company does not own (directly or indirectly) 10% or more of any class of a corporation's publicly traded equity interests. The Company does not own an interest in any general or limited partnership or joint venture.

I, the undersigned authorized officer of the Company, named as the debtor in this case, declare under penalty of perjury that I have reviewed the foregoing and that it is true and correct to the best of my knowledge, information and belief, with reliance on appropriate corporate officers.

Dated: New York, New York
April 10, 2008

/s/ Edward M. Christie, III

Edward M. Christie III
Senior Vice President, Finance

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
In re:

:
: Chapter 11 Case No.

FRONTIER AIRLINES
HOLDINGS, INC., et al.,

: 08-____ ()
:

Debtor.
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LIST OF EQUITY SECURITY HOLDERS

Frontier Airlines Holdings, Inc. ("the "Company") hereby files its List of Equity Security Holders pursuant to Rule 1007(a)(3) of the Federal Rules of Bankruptcy Procedure. This list represents the Company's equity security holders as of July 27, 2007.

SHAREOWNER	SHARES BENEFICIALLY OWNED	% OF OWNERSHIP
FMR Corp.	3,684,813	10.071%
Donald Smith & Co., Inc.	3,658,672	9.99%
Dimensional Fund Advisors LP	3,137,661	8.58%
Technology Pioneer Corp.	2,729,627	7.50%
T. Rowe Price Associates, Inc.	2,671,200	7.20%
Lord, Abbett & Co. LLC	2,529,804	6.91%
Yong Ping Duan/Enlight Foundation	2,474,859	7.50%
Barclays Global Investors, NA	2,005,419	5.47%
CNH Partners, LLC	1,961,693	5.09%

I, the undersigned authorized officer of the Company, named as the debtor in this case, declare under penalty of perjury that I have reviewed the foregoing and that it is

true and correct to the best of my knowledge, information and belief, with reliance on appropriate corporate officers.

Dated: New York, New York
April 10, 2008

/s/ Edward M. Christie, III
Edward M. Christie III
Senior Vice President, Finance

CERTIFICATE OF RESOLUTIONS

I, Edward M. Christie III, a duly authorized officer of Frontier Airlines Holdings, Inc., a Delaware corporation (the "**Company**"), hereby certify that at a meeting of the Board of Directors of the Company duly called and held on April 10, 2008, the following resolutions were duly adopted in accordance with the requirements of Delaware General Corporation Law and that, as of the date hereof, these resolutions have not been amended or modified and are in full force and effect:

RESOLVED, that in the judgment of the Board of Directors of Frontier Airlines Holdings, Inc. (the "**Company**"), it is desirable and in the best interests of the Company, its creditors, employees and other interested parties that a petition be filed by the Company seeking relief under the provisions of chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**");

RESOLVED, that the officers of the Company (each, an "**Authorized Officer**") be, and each of them hereby is, authorized on behalf of the Company to execute and verify petitions under chapter 11 of the Bankruptcy Code and to cause such petitions to be filed in the United States Bankruptcy Court for the Southern District of New York (the "**Court**"), each such petition to be filed at such time as the Authorized Officer executing the petition shall determine and to be in the form approved by the Authorized Officer executing such petition, such approval to be conclusively evidenced by the execution, verification and filing thereof;

RESOLVED, that the law firm of Davis Polk & Wardwell be, and hereby is, retained as attorneys for the Company in the Company's chapter 11 case, subject to the approval of the Court;

RESOLVED, that Togut, Segal & Segal, LLP be, and hereby is, retained as counsel for the debtors with respect to conflicts and other designated matters for the Company in the Company's chapter 11 case, subject to the approval of the Court;

RESOLVED, that Faegre & Benson LLP be, and hereby is, retained as special counsel for the Company in the Company's chapter 11 case, subject to the approval of the Court;

RESOLVED, that Epiq Bankruptcy Solutions, LLC be, and hereby is, retained as notice and claims agent for the Company in the Company's chapter 11 case, subject to the approval of the Court;

RESOLVED, that Kekst and Company be, and hereby is, retained as communications advisor for the Company in the Company's chapter 11 case;

RESOLVED, that the Authorized Officers be, and each of them hereby is, authorized on behalf of the Company to execute and file in the Company's chapter 11 case all petitions, schedules, motions, lists, applications, pleadings and other papers, and, in connection therewith, to retain and obtain assistance from additional legal counsel, accountants, financial advisors and other professionals, and to take and perform any and all further acts and deeds that any such Authorized Officer deems necessary or desirable in connection with the Company's chapter 11 case;

RESOLVED, that the Authorized Officers be, and each of them hereby is, authorized on behalf of the Company to take any and all actions, to execute, deliver, certify, file and/or record and perform any and all documents, agreements, instruments, motions, affidavits, applications for approvals or rulings of governmental or regulatory authorities or certificates and to take any and all steps deemed by any such Authorized Officer to be necessary or desirable to carry out the purpose and intent of each of the foregoing resolutions; and

RESOLVED, that any and all actions heretofore taken by any Authorized Officer or the directors of the Company in the name and on behalf of the Company in furtherance of the purpose and intent of any or all of the foregoing resolutions be, and hereby are, ratified, confirmed and approved in all respects.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of April, 2008.

/s/ Edward M. Christie, III

Name: Edward M. Christie III

Title: Senior Vice President, Finance